

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**J. W., a minor, by and through AMANDA
WILLIAMS as Guardian and Next Friend**

PLAINTIFF

v.

CIVIL ACTION NO.: 3:21-cv-663-CWR-LGI

**THE CITY OF JACKSON, MISSISSIPPI;
CHOKWE A. LUMUMBA, JR.; TONY YARBER;
KISHIA POWELL; ROBERT MILLER; JARRIOT
SMASH; THE MISSISSIPPI DEPARTMENT OF
HEALTH; JIM CRAIG; TRILOGY ENGINEERING
SERVICES, LLC; AND John Does 1-40**

DEFENDANTS

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFF’S ORIGINAL COMPLAINT AND JURY TRIAL DEMAND**

COMES NOW Defendant Trilogy Engineering Services, LLC (“Trilogy”), by and through counsel, and submits this Unopposed Motion for Extension of Time to Respond to Plaintiff’s Original Complaint and Jury Trial Demand and in support would show the following:

1. Plaintiff, J.W., a Minor, by and through Amanda Williams, as Guardian and Next Friend (herein “Plaintiff”) filed an Original Complaint with Jury Trial Demand (the “Complaint”) on October 19, 2021. *See* Compl., ECF No. 1.

2. Trilogy’s responsive pleading is currently due December 2, 2021. Trilogy requests an extension up to and including January 12, 2022, in which to file its responsive pleading to Plaintiff’s Complaint.

3. The undersigned has conferred with counsel for Plaintiff who has no objection to the relief sought.

4. Trilogy's co-defendants, The City of Jackson, Mississippi; Chokwe A. Lumumba, Jr.; Tony Yarber; Kishia Powell; Robert Miller; and Jarriot Smash, have already received the same responsive pleading deadline extension, *i.e.*, to January 12, 2022, being requested herein. Therefore, the relief sought will not delay the administration of this matter in any way. *See* Agreed Order, ECF No. 29. Further, this request is being made for good cause and is not made for the purpose of delay, harassment, or any other purpose rooted in bad faith.

WHEREFORE, PREMISES CONSIDERED, Defendant Trilogy Engineering Services, LLC, requests an order extending their time for responding to Plaintiff's Original Complaint and Jury Trial Demand filed in this matter up to and including January 12, 2022.

This the 2nd day of December, 2021.

Respectfully submitted,

TRILOGY ENGINEERING SERVICES, LLC

By: /s/ D. Jason Childress
D. JASON CHILDRESS

OF COUNSEL

D. Jason Childress (MSB #103678)
WISE CARTER CHILD & CARAWAY, P.A.
401 E. Capitol Street, Suite 600 (39201)
Post Office Box 651
Jackson, Mississippi 39205-0651
P: 601-968-5500
F: 601-968-5593
Email: djc@wisecarter.com

CERTIFICATE OF SERVICE

I, D. Jason Childress, attorney for Trilogy Engineering Services, LLC, hereby certify that I have filed the above *Unopposed Motion for Extension of Time to Respond to Plaintiff's Original Complaint and Jury Trial Demand* with the Clerk of this Court via the ECF System, which served copies upon all counsel and parties of record.

This the 2nd day of December, 2021.

/s/ D. Jason Childress

D. JASON CHILDRESS